DOCUMENT RESUME

ED 211 586 TM 820 009

TITLE Individualized Education Program. Self-Audit.
INSTITUTION Illinois State Board of Education, Springfield, Dept. of Planning, Research and Evaluation.; Illinois State Board of Education, Springfield. Div. of Specialized Education Services.
PUB DATE 81
NOTE 31p.

EDRS PRICE MF01/PC02 Plus Postage.
DESCRIPTORS *Disabilities; Federal Legislation; *Individualized Education Programs; Program Implementation; *School Districts; *Self Evaluation (Groups); *Special Education; State Legislation; Worksheets
IDENTIFIERS *Education for All Handicapped Children Act; *Illinois

ABSTRACT

This self-audit package is intended for use by Illinois administrative units to determine to what extent they meet the requirements of Public Law 94-142 and the State Rules and Regulations to Govern the Administration and Operation of Special Education. Such determination can be achieved by auditing the Individualized Education Program (IEP) system as it functions within the school district or local setting. The IEP Self-Audit can be used to identify problems, highlight areas of excellence and plan improvements in IEP implementation and to demonstrate responsible and accountable management. The IEP Self-Audit consists of 37 questions regarding IEP procedures and implementation. All 37 questions address items which are required by federal/state laws. The questions are organized in a logical progression from the IEP document itself, the IEP and related documents, related documents only, and questions that are procedural in nature. Instructions are given for completing the tally work sheets and for compiling the data and computing the percentages on the Results of the IEP Self-Audit Document. Legal interpretations regarding specific self-audit questions or procedures associated with IEP implementation are presented in the final section of the document. (Author/AL)

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Individualized Education Program

SELF-AUDIT

Fall, 1981

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Department of Planning, Research and Evaluation
Program Evaluation and Assessment Section
and
Department of Specialized Educational Services
Program Approval Section

TM 820 009

Individualized Education Program

SELF-AUDIT

Fall, 1981

Department of Planning, Research and Evaluation
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Program Approval Section

Illinois State Board of Education

Edward Copeland, Chairman
Illinois State Board of Education

Donald G. Gill
State Superintendent of Education

FOREWORD

The Illinois State Board of Education is pleased to present the Individualized Education Program Self-Audit. We hope this self-audit package will be beneficial to the providers of special education services throughout Illinois. We are especially appreciative of the time and effort given to the development of this project by the providers of special education services who participated during the past one and one-half years in the pilot test and field test of over 1,000 IEPs.

We would like to acknowledge the assistance of Nancy Spinner of the Department of Planning, Research, and Evaluation who, in cooperation with the Department of Specialized Educational Services, conducted the pilot test, field test, and data analysis for this project.

Donald G. Gill

Donald G. Gill
State Superintendent of Education

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INTRODUCTION

The Individualized Education Program Self-Audit package represents over one year of joint effort on the part of special education experts from throughout Illinois and staff from the Illinois State Board of Education. The package has been tested in 16 sites in Illinois and represents an examination of over 1,000 IEP's.

By investing a little time and effort in this project, you can learn a great deal about the quality of special education and related services you are providing.

The following questions represent a small sample of the kinds of issues raised in the self-audit. This exercise will give you some indication of the strengths and weaknesses of your special education program.

What is the role of parents in planning and implementing the IEP?

Are you following procedures outlined in the statutes for setting up meetings?

Do your special education students have contact with non-handicapped students?

Are the appropriate personnel from the school present at IEP meetings?

Do your IEPs outline specially designed instruction relative to the unique needs of the child, or do they list curricular activities available to all children?

INSTRUCTIONS FOR THE IEP SELF-AUDIT

Overview

The IEP Self-Audit system has been developed as a joint effort by staff from the Department of Planning, Research, and Evaluation, Program Evaluation and Assessment Section, and the Department of Specialized Educational Services, Program Approval Section, of the Illinois State Board of Education. In addition, this document was pilot-tested and field-tested in 16 sites in Illinois including local education agencies, joint agreements and a facility under the jurisdiction of the Department of Mental Health and Developmental Disabilities. This self-audit system will be utilized by administrative units to determine to what extent they meet the requirements of Public Law 94-142. Such determination will be made by auditing the IEP system as it functions within the school district or local setting. This self-auditing system can be utilized by administrative units to determine their present level of implementation.

The IEP Self-Audit can answer many questions about IEP implementation. For example, a self-audit could be conducted to determine if IEPs have been developed for students according to the regulations of P.L. 94-142 and the Rules and Regulations to Govern the Administration and Operation of Special Education, or a self-audit could be conducted to identify problems in IEP implementation. Also, the IEP Self-Audit could highlight areas of outstanding IEP implementation.

Results from IEP Self-Audits can be a useful data base for planning improvements of IEP implementation as well as providing a ready and defensible response with regard to the status of IEPs. The self-audit should be a useful tool for school administrators in working toward the desired level of IEP implementation. One of the most promising advantages of an IEP self-audit is that it allows time to prepare for an external audit from the Illinois State Board of Education, Compliance Review Unit. In addition, internal self-audits can validate external audit results or provide information for comparison and more insightful interpretation.

In summary, the IEP Self-Audits can improve IEP implementation and be useful for demonstrating responsible and accountable management. Self-Audits provide current and reliable information to school leadership in order to foster informed decision making.

About the Procedures

The IEP Self-Audit consists of 37 questions. These questions address the IEP document itself and procedures relative to IEP implementation. Some of the questions may be answered by examining the IEP document alone. Other questions require an examination of the IEP document and related documents (such as notices to parents) in the child's case record. Still other questions may be answered by examining only those documents relative to the IEP process which will be found in the student's case record. Each question contains cross references from the State Rules and Regulations to Govern the Administration and Operation of Special Education and the Federal Regulations at 34 Code of Federal Regulations sections 300 and following, issued pursuant to the Education of All Handicapped Children Act, Public Law 94-142. State regulations citations are noted in parentheses.

While the format for IEPs varies from one administrative unit to another, the questions have been organized in a logical progression from the IEP document itself, the IEP and related documents, related documents only, and questions that are procedural in nature.

The "Instructions for Completing the Tally Work Sheets" section delineates the step-by-step procedures for conducting the self-audit. Although the "Instructions" include the number of IEP's to be sampled, the emphasis in this self-audit is quality. The Self-Audit will provide the Administrative Unit valuable information about the quality of the written document (IEP), the quality or effectiveness of staff-to-parent and staff-to-student communication, etc. The IEP Self-Audit takes a step beyond compliance/non-compliance and provides details about the quality of implementation.

IEP SELF-AUDIT QUESTIONS

Questions	State and Federal Regulations
1. Does the IEP contain a statement of the child's present levels of educational performance?	300.346 (9.18a.4.a.)
2. Does the IEP include a statement of annual goals?	300.346 (9.18a.4.b.)
3. Does the IEP include short-term instructional objectives?	300.346 (9.18a.4.b.)
4. Does the IEP contain a statement of the specific special education and related services to be provided?	300.346 (9.18a.4.c.)
5. Does the IEP specify the extent to which the child will be able to participate in regular education programs?	300.227 300.346 300.550 (9.18a.4.c.)
6. Where appropriate, does the IEP specify any specially designed physical education services?	300.306 300.307 300.346 (9.18a.4.c.)
7. Are projected dates for initiation of services specified in the IEP?	300.346 (9.18a.4.d)
8. Is the anticipated duration of services specified in the IEP?	300.346 (9.18a.4.d.)
9. Are appropriate objective criteria for determining the achievement of the short-term instructional objectives included in the IEP?	300.346 (9.18a.4.e.)
10. Are appropriate evaluation procedures and schedules for determining the achievement of the short-term instructional objectives included in the IEP?	300.346 (9.18a.4.e.)
11. Has an IEP been developed for each handicapped child, including those enrolled in private facilities, for whom public funds are expended?	300.341 300.342 300.343 (8.03) (9.18a)

Questions

12. Was an IEP in effect for each handicapped child prior to the date that special education and related services were actually provided?	300.342 (9.17.1.b) (9.20)
13. Has an IEP meeting been held within thirty (30) calendar days of the determination that a handicapped child is eligible for special education services?	300.343 (9.18a)
14. Was the student's teacher in attendance at the IEP meeting?	300.344 (9.18a.2.b.)
15. Was a representative of the local district, other than the child's teacher, present at the IEP meeting?	300.344 (9.18a.2.a)
16. Was the student's parent(s) or guardian(s) in attendance at the IEP meeting?	300.344 300.345 (9.18a.2.c.)
17. Where appropriate, was the student in attendance at the IEP meeting?	300.344 (9.18a.2.d.)
18. If a child has been evaluated for the first time, was a member of the evaluation team or someone knowledgeable about the evaluation procedures and results of the evaluation in attendance at the IEP meeting?	300.344 (9.18a.3)
19. Were other persons, as designated by the parents or agency, in attendance at the IEP meeting?	300.344 (9.18a.2.e)
20. Has the IEP been reviewed or revised annually?	300.343 (9.25)
21. Were parents given a copy of the IEP, upon request?	300.345 (9.18a.5)
22. Was the handicapped child's educational placement based on his/her IEP?	300.552 (9.17.1.b.)
23. Have special education and related services been provided to the handicapped child in accordance with the IEP?	300.349 (9.18a.4.e.)

Questions

24. If the participants (parents or child) in the IEP meeting were deaf, was an interpreter for the deaf provided?	300.345 (9.18a.3)
25. If the participants (parents or child) in the IEP meeting were non-English speaking, was an interpreter provided?	300.345 (9.04.1.)
26. If a handicapped child was referred to a private school or facility, did the public agency develop an IEP prior to placement?	300.552 (8.03)
27. If a handicapped student has been placed in a private facility, were IEP meetings or revisions of IEPs conducted by the private facility at the discretion of the public agency?	300.347 (8.03)
28. If a handicapped child has been referred to a private facility, was a representative of the private facility in attendance at the IEP meeting?	300.347 (8.03)
29. Were parents of the handicapped child notified of the meeting to develop and/or review and/or revise the IEP?	300.345 (9.04) (9.28)
30. Were parents given prior notice of the IEP meeting in order to assure their attendance?	300.345 (9.04)
31. Did the notice to the parents include purpose, time and location of the meeting, and list those who would be in attendance?	300.345 (9.18a.1.c.)
32. If neither parent attended the IEP meeting, were other methods (including individual or conference telephone calls) used to insure parent participation?	300.345 (9.18a.2.c.)
33. If parents did not participate in the IEP meeting, does documentation exist that attempts were made to establish a mutually agreed upon time and place for the meeting?	300.345 (9.18a.2.c.)

Questions

34. Was the IEP meeting scheduled at a mutually agreed upon time and place?	300.345 (9.18a.1.b.)
35. Is the handicapped child placed in an educational program which allows for maximum interaction with nonhandicapped children?	300.550 (300.550.2 (9.17.1.a.) (1.05)
36. Is the handicapped child's placement located as close to home as possible?	300.552 300.552.d. (9.17.1.b.)
37. Where appropriate, is the handicapped child placed in the school which he or she would attend if not handicapped?	300.552 (9.17.1.c.)

TALLY WORK SHEETS

Instructions for Completing the Tally Work Sheets

The IEP Self-Audit consists of 37 questions regarding IEP procedures and implementation. All 37 questions address items which are required by federal/state laws. Not all of the 37 items will be applicable to all administrative units. As an example, private placements would be irrelevant for an administrative unit which has no private placements. In such a situation, the logical choice on the Tally Work Sheet would be "N/A" or "not applicable." In those instances where a question is applicable, the administrative unit should rate the implementation of the IEP or procedure as "Yes" or "No."

Enclosed you will find a list containing 37 self-audit questions along with a Tally Work Sheet. You will need to fill out a Tally Work Sheet for each category of handicap for which you have administrative responsibility. That is, if an administrative unit serves the categories of speech-impaired, educable mentally handicapped, and learning-disabled children, a separate Tally Work Sheet would need to be completed for each of these three categories. A single copy of the 37-item Tally Work Sheet is enclosed. Duplicate enough copies of the Tally Work Sheet to equal the number of categories your unit serves. In the example above, only three copies would be needed as only three categories are served.

In order to draw the sample for your self-audit, first list all categories of handicapping conditions for which you have administrative responsibility. For purposes of the self-audit, the FACTS Form submitted to ISBE for this current school year or the previous school year will provide readily available categories of handicaps and numbers of students in each handicapping category. The categories of "cross-categorical" and "early childhood" should be listed as handicapping categories. Next, for each handicapping condition, list the total number of students served. Finally, multiply the number of students served for each handicapping condition by 5% (.05) to determine how large a sample to use for your self-audit. Three (3) IEPs should be the fewest number sampled in any handicapping category unless there are fewer than 3 students served in a handicapping category. That is, a sparsely populated school district may have three or fewer students in a low-incidence handicapping category. Should this situation occur, one or two IEPs would be sampled. One should select the sample based on the primary handicapping condition.

As an example, refer to the table below. The administrative unit serves only three categories: educable mentally handicapped, learning disabled, and speech impaired (continued from the example above). In the category of educable mentally handicapped, the administrative unit has responsibility for 2,000 students; for learning disabled, the administrative unit has responsibility for 100 students; for speech impaired, 40 students. Since only three categories are served in the example, only three categories will be drawn for the sample.

Handicapping Condition	Number of Students in Population	5% of Number of Students for Sample
educable mentally handicapped	2,000	100
learning disabled	100	5
speech impaired	40	3
Total	2,140	108

By taking 5% of the number of students in each category, the size of the sample is determined. For educable mentally handicapped, 5% of 2,000 is 100. Thus, 100 IEPs of educable mentally handicapped students would be drawn for the sample.

For learning disabled, 5% of 100 is 5, so you would select 5 IEPs of learning-disabled students for the self-audit. For speech impaired, however, 5% of 40 is only 2. Since the handicapping category speech impaired in this example has 40 students, 3 IEPs should be sampled.

The IEPs to be selected for the self-audit should be randomly chosen. The word "random" means that all units in the total population have an equal chance of being selected. Some simple techniques to insure random selection include a table of random numbers, drawing numbers from a box, flipping a coin, or throwing a single die. The main thing to remember in your selection of IEPs for the self-audit is to give all potential items in each category an equal chance. Drawing a sample in this manner does not insure that any results can be generalized to all handicapped students served.

IEPs for each handicapping condition should be examined across all grade levels (when possible and feasible) for which the administrative unit has responsibility.

The Sample Tally Work Sheet (on the following page) further illustrates the above example in which the category of learning disabled is examined (5 IEPs).

SAMPLE

TALLY WORK SHEET

Category of Handicap: Learning Disabled

Number of IEPs Examined: 5

		Total
1. Does the IEP contain a statement of the child's present levels of educational performance?	Yes	4
	No	1
2. Does the IEP include a statement of annual goals?	Yes	3
	No	2
3. Does the IEP include short-term instructional objectives?	Yes	5
	No	
4. Does the IEP contain a statement of the specific special education and related services to be provided?	Yes	4
	No	1
5. Does the IEP specify the extent to which the child will be able to participate in regular education programs?	Yes	2
	No	3
6. Where appropriate, does the IEP specify any specially designed physical education services?	NA	3
	Yes	1
	No	1
7. Are projected dates for initiation of services specified in the IEP?	Yes	5
	No	
8. Is the anticipated duration of services specified in the IEP?	Yes	2
	No	3
9. Are appropriate objective criteria for determining the achievement of the short-term instructional objectives included in the IEP?	Yes	3
	No	2

TALLY WORK SHEET

Category of Handicap _____

Number of IEPs Examined _____

Total

1. Does the IEP contain a statement of the child's present levels of educational performance?
   Yes _____
   No _____

2. Does the IEP include a statement of annual goals?
   Yes _____
   No _____

3. Does the IEP include short-term instructional objectives?
   Yes _____
   No _____

4. Does the IEP contain a statement of the specific special education and related services to be provided?
   Yes _____
   No _____

5. Does the IEP specify the extent to which the child will be able to participate in regular education programs?
   Yes _____
   No _____

6. Where appropriate, does the IEP specify any specially designed physical education services?
   NA _____
   Yes _____
   No _____

7. Are projected dates for initiation of services specified in the IEP?
   Yes _____
   No _____

8. Is the anticipated duration of services specified in the IEP?
   Yes _____
   No _____

9. Are appropriate objective criteria for determining the achievement of the short-term instructional objectives included in the IEP?
   Yes _____
   No _____

Total

10. Are appropriate evaluation procedures and schedules for determining the achievement of the short-term instructional objectives included in the IEP?
    Yes_____
    No _____

11. Has an IEP been developed for each handicapped child, including those enrolled in private facilities, for whom public funds are expended?
    Yes_____
    No _____

12. Was an IEP in effect for each handicapped child prior to the date that special education and related services were actually provided?
    Yes_____
    No _____

13. Has an IEP meeting been held within thirty (30) calendar days of the determination that a handicapped child is eligible for special education services?
    Yes_____
    No _____

14. Was the student's teacher in attendance at the IEP meeting?
    Yes_____
    No _____

15. Was a representative of the local district, other than the child's teacher, present at the IEP meeting?
    Yes_____
    No _____

16. Was the student's parent(s) or guardian(s) in attendance at the IEP meeting?
    Yes_____
    No _____

17. Where appropriate, was the student in attendance at the IEP meeting?
    NA _____
    Yes_____
    No _____

Total

18. If a child has been evaluated for the first time, was a member of the evaluation team or someone knowledgeable about the evaluation procedures and results of the evaluation in attendance at the IEP meeting?
NA _____
Yes _____
No _____

19. Were other persons, as designated by the parents or agency, in attendance at the IEP meeting?
NA _____
Yes _____
No _____

20. Has the IEP been reviewed or revised annually?
NA _____
Yes _____
No _____

21. Were parents given a copy of the IEP, upon request?
NA _____
Yes _____
No _____

22. Was the handicapped child's educational placement based on his/her IEP?
Yes _____
No _____

23. Have special education and related services been provided to the handicapped child in accordance with the IEP?
Yes _____
No _____

24. If the participants (parents or child) in the IEP meeting were deaf, was an interpreter for the deaf provided?
NA _____
Yes _____
No _____

25. If the participants (parents or child) in the IEP meeting were non-English speaking, was an interpreter provided?
NA _____
Yes _____
No _____

Total

26. If a handicapped child was referred to a private school or facility, did the public agency develop an IEP prior to placement?
NA _____
Yes _____
No _____

27. If a handicapped student has been placed in a private facility, were IEP meetings or revisions of IEPs conducted by the private facility at the discretion of the public agency?
NA _____
Yes _____
No _____

28. If a handicapped child has been referred to a private facility, was a representative of the private facility in attendance at the IEP meeting?
NA _____
Yes _____
No _____

29. Were parents of the handicapped child notified of the meeting to develop and/or review and/or revise the IEP?
Yes _____
No _____

30. Were parents given prior notice of the IEP meeting in order to assure their attendance?
Yes _____
No _____

31. Did the notice to the parents include purpose, time and location of the meeting, and list those who would be in attendance?
Yes _____
No _____

32. If neither parent attended the IEP meeting, were other methods (including individual or conference telephone calls) used to insure parent participation?
NA _____
Yes _____
No _____

33. If parents did not participate in the IEP meeting, does documentation exist that attempts were made to establish a mutually agreed upon time and place for the meeting?
NA _____
Yes _____
No _____

Total

34. Was the IEP meeting scheduled at a mutually agreed upon time and place?
Yes_____
No _____

35. Is the handicapped child placed in an educational program which allows for maximum interaction with nonhandicapped children?
Yes_____
No _____

36. Is the handicapped child's placement located as close to home as possible?
Yes_____
No _____

37. Where appropriate, is the handicapped child placed in the school which he or she would attend if not handicapped?
NA _____
Yes_____
No _____

INSTRUCTIONS FOR COMPILING THE DATA AND COMPUTING THE PERCENTAGES ON THE RESULTS OF THE IEP SELF-AUDIT DOCUMENT

Upon completion of examination of the IEPs in the sample for each handicapping condition served by your administrative unit, the final step will be the compilation of the totals from each question across all categories. This can best be accomplished by laying out, total column to total column, the Tally Work Sheets for each handicapping category you sampled. The totals for each question, as well as the percentages, can be listed on the Results of the IEP Self-Audit Document, which will serve as your final report form and your record of progress in IEP implementation. The Results of the IEP Self-Audit Document contains two types of questions:

(A) The "percent" questions that require a yes/no response,

(B) The "percent" questions that require a yes/no or "Not Applicable" (N/A) response.

Question #1 is an example of (A) outlined above. If 200 IEPs were examined and the results were 100 "yes" responses and 100 "no" responses, the percentages would be 50% "yes" and 50% "no."

Question #6 requires an "N/A" response and is an example of (B) above. The following procedure should be followed when an "N/A" response is used:

(1) Deduct the number of "N/A" responses for a question from the sample total;

(2) Calculate the percent of positive responses based on the new sample total minus the number of "N/A" responses; and

(3) Mark the appropriate answer on the Results of the IEP Self-Audit Document that indicates your sample results.

As an example, the results of Question #6 elicited 25 "N/A" responses. The total sample size was 200. Take the sample size (200) minus the "N/A" responses (25) which gives a new sample size of 175. The percent of "yes" and "no" responses is figured on a total sample of 175 rather than 200. If the results were 145 "yes" and 30 "no," then the percentages would be 83% "yes" and 17% "no." After determining the number and percentages for each question, use the Results of the IEP Self-Audit Document for the final report.

RESULTS OF THE IEP SELF-AUDIT DOCUMENT

	Number	Percent
1. Does the IEP contain a statement of the child's present levels of educational performance?	Yes_____	Yes_____
	No _____	No _____
2. Does the IEP include a statement of annual goals?	Yes_____	Yes_____
	No _____	No _____
3. Does the IEP include short-term instructional objectives?	Yes_____	Yes_____
	No _____	No _____
4. Does the IEP contain a statement of the specific special education and related services to be provided?	Yes_____	Yes_____
	No _____	No _____
5. Does the IEP specify the extent to which the child will be able to participate in regular education programs?	Yes_____	Yes_____
	No _____	No _____
6. Where appropriate, does the IEP specify any specially designed physical education services?	NA _____	
	Yes_____	Yes_____
	No _____	No _____
7. Are projected dates for initiation of services specified in the IEP?	Yes_____	Yes_____
	No _____	No _____
8. Is the anticipated duration of services specified in the IEP?	Yes_____	Yes_____
	No _____	No _____
9. Are appropriate objective criteria for determining the achievement of the short-term instructional objectives included in the IEP?	Yes_____	Yes_____
	No _____	No _____

	Number	Percent
10. Are appropriate evaluation procedures and schedules for determining the achievement of the short-term instructional objectives included in the IEP?	Yes_____	Yes_____
	No _____	No _____
11. Has an IEP been developed for each handicapped child, including those enrolled in private facilities, for whom public funds are expended?	Yes_____	Yes_____
	No _____	No _____
12. Was an IEP in effect for each handicapped child prior to the date that special education and related services were actually provided?	Yes_____	Yes_____
	No _____	No _____
13. Has an IEP meeting been held within thirty (30) calendar days of the determination that a handicapped child is eligible for special education services?	Yes_____	Yes_____
	No _____	No _____
14. Was the student's teacher in attendance at the IEP meeting?	Yes_____	Yes_____
	No _____	No _____
15. Was a representative of the local district, other than the child's teacher, present at the IEP meeting?	Yes_____	Yes_____
	No _____	No _____
16. Was the student's parent(s) or guardian(s) in attendance at the IEP meeting?	Yes_____	Yes_____
	No _____	No _____
17. Where appropriate, was the student in attendance at the IEP meeting?	NA _____	
	Yes_____	Yes_____
	No _____	No _____

		Number	Percent
18. If a child has been evaluated for the first time, was a member of the evaluation team or someone knowledgeable about the evaluation procedures and results of the evaluation in attendance at the IEP meeting?	NA	_____	
	Yes	_____	Yes _____
	No	_____	No _____
19. Were other persons, as designated by the parents or agency, in attendance at the IEP meeting?	NA	_____	
	Yes	_____	Yes _____
	No	_____	No _____
20. Has the IEP been reviewed or revised annually?	NA	_____	
	Yes	_____	Yes _____
	No	_____	No _____
21. Were parents given a copy of the IEP, upon request?	NA	_____	
	Yes	_____	Yes _____
	No	_____	No _____
22. Was the handicapped child's educational placement based on his/her IEP?	Yes	_____	Yes _____
	No	_____	No _____
23. Have special education and related services been provided to the handicapped child in accordance with the IEP?	Yes	_____	Yes _____
	No	_____	No _____
24. If the participants (parents or child) in the IEP meeting were deaf, was an interpreter for the deaf provided?	NA	_____	
	Yes	_____	Yes _____
	No	_____	No _____
25. If the participants (parents or child) in the IEP meeting were non-English speaking, was an interpreter provided?	NA	_____	
	Yes	_____	Yes _____
	No	_____	No _____

		Number	Percent
26.	If a handicapped child was referred to a private school or facility, did the public agency develop an IEP prior to placement?	NA _____	
		Yes_____	Yes_____
		No _____	No _____
27.	If a handicapped student has been placed in a private facility, were IEP meetings or revisions of IEPs conducted by the private facility at the discretion of the public agency?	NA _____	
		Yes_____	Yes_____
		No _____	No _____
28.	If a handicapped child has been referred to a private facility, was a representative of the private facility in attendance at the IEP meeting?	NA _____	
		Yes_____	Yes_____
		No _____	No _____
29.	Were parents of the handicapped child notified of the meeting to develop and/or review and/or revise the IEP?	Yes_____	Yes_____
		No _____	No _____
30.	Were parents given prior notice of the IEP meeting in order to assure their attendance?	Yes_____	Yes_____
		No _____	No _____
31.	Did the notice to the parents include purpose, time and location of the meeting, and list those who would be in attendance?	Yes_____	Yes_____
		No _____	No _____
32.	If neither parent attended the IEP meeting, were other methods (including individual or conference telephone calls) used to insure parent participation?	NA _____	
		Yes_____	Yes_____
		No _____	No _____
33.	If parents did not participate in the IEP meeting, does documentation exist that attempts were made to establish a mutually agreed upon time and place for the meeting?	NA _____	
		Yes_____	Yes_____
		No _____	No _____

	Number	Percent
34. Was the IEP meeting scheduled at a mutually agreed upon time and place?	Yes_____	Yes_____
	No _____	No _____
35. Is the handicapped child placed in an educational program which allows for maximum interaction with nonhandicapped children?	Yes_____	Yes_____
	No _____	No _____
36. Is the handicapped child's placement located as close to home as possible?	Yes_____	Yes_____
	No _____	No _____
37. Where appropriate, is the handicapped child placed in the school which he or she would attend if not handicapped?	NA _____	
	Yes_____	Yes_____
	No _____	No _____

Questions and Answers

During the inservice sessions for the pilot test and field test of the IEP Self-Audit, a number of questions were raised repeatedly concerning "legal" interpretations regarding specific self-audit questions or procedures associated with IEP implementation. The following questions were reviewed and answered by the legal staff for special education, Illinois State Board of Education.

Q. At the IEP meeting, who is the appropriate representative from the local level? Must this person have a supervisory certificate?

A. The appropriate representative from the local level is someone other than the child's teacher who is qualified to provide or supervise special education. The person does not necessarily have to hold a supervisory certificate.

Q. Should short-term instructional objectives be attached to the master copy of the IEP? They are often kept by the teacher in the classroom - lesson plans.

A. Short-term instructional objectives must be a part of the master document. Copies may be kept by the teacher in the classroom. However, short-term instructional objectives are not synonymous with lesson plans.

Q. Refer to Question 12 of the Self-Audit. "Was an IEP in effect for each handicapped child prior to the date that special education and related services were actually provided?"

A. According to Federal law, any child coming into special education after 10-01-77 must have an IEP in place before special education and related services can be provided. This includes students transferring from other districts and states.

Q. Is it appropriate to hold a combination multidisciplinary staffing and IEP meeting? (Refer to question 13 of the Self-Audit.)

A. In accordance with 9.15.3 of the State Rules and Regulations, it is legally acceptable to hold a combination IEP meeting and multidisciplinary staffing.

Q. Was the student's teacher in attendance at the IEP meeting? Does this refer to the regular education teacher or the special education teacher?

A. The teacher who is primarily responsible for the teaching of the child must be in attendance at the IEP meeting. If the child is new (or unknown) to the district, the evaluation rule applies, i.e., someone must be present who is knowledgeable about the particular type of disability and about teaching that particular type of disability.

Q. Was a representative of the local district, other than the child's teacher, present at the IEP meeting? (This is question 15 of the Self-Audit.) Does "other than the child's teacher" refer to the director or his designee?

A. The Director or his designee must always be present at the IEP meeting. Additional staff, other than the child's teacher, may be present. Such additional staff may include the psychologist, social worker, speech therapist, etc.

Q. Is question 22 of the Self-Audit synonymous with question 12?

22. Was the handicapped child's educational placement based on his/her IEP?

12. Was an IEP in effect for each handicapped child prior to the date that special education and related services were actually provided?

A. No. The questions are not synonymous. The IEP must be developed before placement and actual implemented placement must be consistent with the written document.

Q. (Refer to question 28 of the Self-Audit.) If a handicapped child has been referred to a private facility, was a representative of the private facility in attendance at the IEP meeting? Is telephone attendance acceptable?

A. Yes, but it must be documented. Refer to 300.347.a.2.

Q. What is the justification for placement? This is a special problem with private placements.

A. The justification for placement is the concensus recommendation of the multidisciplinary conference. In the State Rules and Regulations, refer to 9.17, 8.02, and 8.04.1.

Q. What are "present levels of educational performance"? (Refer to question 1 of the Self-Audit.) If they are listed specifically on the IEP, should they be measurable, such as test scores, grade levels, etc.?

A. There is no legal definition of "present levels of educational performance." Refer to 9.09.3(f) and 9.09.3(g) of the State Rules and Regulations. Present levels of educational performance include test scores and other standardized measurements of achievement; they should be listed on the IEP. They should be measurable, if the child is functioning at a measurable level.

Q. Some children come into the district without an IEP. What is the district to do in these cases? The parents often do not have a copy of a previous IEP and can tell the district little or nothing about their child's previous special education programming. It often takes a long time for the papers to be received from the transferring district. Is a telephone call and documentation of the call sufficient information on which to develop an IEP?

A. If no written materials are received from the sending district, telephone calls are not sufficient for developing an IEP. Refer to 9.20 of the State Rules and Regulations. The child is treated as a referral and must be evaluated within 60 school days. In the interim, 9.23.3 of the State Rules applies.

Q. Were parents given prior notice of the IEP meeting in order to assure their attendance? (This is question 30 of the Self-Audit.) This question presents a problem for cooperatives because the notices to parents are maintained at the district level in the district files. What can be done?

A. Unless the cooperative has been given contractual authority to handle notices, this responsibility falls on the LEA. However, if the cooperative is handling the meeting without having been given the notice authority, it must verify with the LEA that proper notice was given to parents. The preferred means of handling this is to have a written copy of the notice. If verification is by telephone, there should be documentation of the telephone call, and a copy of the notice should be included in the cooperative's records at some subsequent date.

Q. Should lunch and recess be included on the IEP?

A. If lunch and recess are the only integration in nonacademic settings the child has with nonhandicapped children, then they should be included to show that least restrictive environment is being carried out. Otherwise, it is not necessary to include them. Refer to 300.553 of the Federal Regulations.

How to Use the Results

The following chart refers to specific questions in the self-audit and illustrates potential findings and corrective action.

Findings	Corrective Action
1. One district within the cooperative did not include short-term instructional objectives on IEP's.	Send "reminder" letter to district superintendent. Emphasize short-term instructional objectives in inservice. Follow-up with district to insure compliance.
5. IEP forms do not specifically ask for "the extent to which the child will participate in regular education programs."	Redesign IEP form. Provide inservice to staff.
9, 10. Short-term instructional objectives did not include appropriate objective criteria and appropriate evaluation procedures and schedules.	Examples: objective criteria = "with 85% accuracy. . ." Evaluation procedures = "oral examination, written examination" etc. Evaluation schedules = "from September, 1981, through January, 1982." Redesign IEP form; provide inservice in objective writing.
16. Results for parent/guardian attendance at IEP meetings were 60% "yes."	Encourage staff/parent communication at next faculty meeting. Establish "parent contact log" for documenting home visits, telephone calls, written communication.
29. Parent notification was reported irregularly throughout the joint agreement.	Revise form to include purpose, time and location of meeting, and list those who will be in attendance. Unless otherwise specified in the joint agreement contract, parent notification is the responsibility of the local district.

Appendix I

The Administrative Units listed below participated in the pilot test and field test of the IEP Self-Audit during 1980 and 1981. Staff from these administrative units spent much time and effort in testing this document on more than 1,000 IEPs. Their cooperation with this project is greatly appreciated.

Pilot Test Participants

Wabash and Ohio Valley Special Education District
Collinsville District #10
Southern Metropolitan Association

Field Test Participants

Kankakee Area Special Education Cooperative
Perandoe Special Education District
Four Rivers Special Education District
Crystal Lake Community Consolidated School District #47
Vermilion Association of Special Education
Cooperative Association for Special Education
South Eastern Special Education Program
Bureau-Marshall-Putnam Tri-County Special Education Cooperative
Ford-Iroquois County Special Education Association
Boone County Special Education Cooperative
Mid-State Special Education Joint Agreement
Zion Benton Township High School District #126
Warren G. Murray Developmental Center, Department of Mental Health and Developmental Disabilities